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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KELVIN GORDON, an individual; LILITH
MCGRATH, an individual; KIANA FULLMORE,
an individual; and the AMERICAN CIVIL
LIBERTIES UNION OF NEVADA
FOUNDATION, a domestic nonprofit corporation,

Plaintiffs,

vs.

THE CITY OF LAS VEGAS, a local municipal
government entity; and FREMONT STREET
EXPERIENCE, LLC, a domestic limited liability
company;

Defendants.

Case No.: 2:22-cv-01446-RFB-EJY

NOTICE OF WITNESSES AND
DOCUMENTS FOR HEARING
SCHEDULED ON OCTOBER 7,
2022

Pursuant to the Court's order dated October 4, 2022, [ECF No. 27] Plaintiffs provide notice of the documents Plaintiffs may offer in support of Plaintiffs' Motion for Temporary Restraining Order at the hearing currently scheduled for October 7, 2022. In addition to the documentation previously filed into the record by Plaintiffs and Defendant Fremont Street Experience, LLC,¹ Plaintiffs Kelvin Gordon, Lilith McGrath, Kiana Fullmore, and the American Civil Liberties Union of Nevada Foundation, through their attorney of record, intend to produce the following:

¹ ECF No. 1-1 (Plaintiff's Exhibits for Complaint); ECF No. 16 (Defendant FSE's Appendix Volume 1); ECF No. 17 (Defendant FSE's Appendix Volume 2).

1. Photograph of Plaintiff McGrath's driver's license (redacted), attached as Plaintiff's **EXHIBIT 9**.
2. Photograph of Plaintiff Fullmore's driver's license (redacted), attached as Plaintiff's **EXHIBIT 10**.
3. Video, manually filed with Court, hereafter Plaintiff's **EXHIBIT 11**.

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

Page 2 of 3

LR 5-1 PROOF OF SERVICE

I HEREBY CERTIFY that on the 5 day of October, 2022

I served: **PLAINTIFF'S NOTICE OF WITNESSES AND DOCUMENTS FOR
HEARING SCHEDULED FOR OCTOBER 7, 2022**

☒ EM/ECF;

☐ Electronic mail; or

☐ US Mail or Carrier Service

Upon: **BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614**

**The City of Las Vegas
Las Vegas City Attorney
495 S. Main St.
Las Vegas, Nevada 89101**

/s/ Courtney Jones

**COURTNEY JONES,
an employee of the ACLU of Nevada**